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LEVI C. MAAIA
VICE PRESIDENT

February 23, 2011

Mr. Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: In the Matter of Rulemaking to Amend The Commission's Rules Governing
Retransmission Consent; MB Docket No. 10-71.**

Dear Chairman Genachowski:

Full Channel strongly agrees that the time has come for the Commission to review retransmission consent rules in light of recent disputes affecting millions of consumers, many of whom were unprepared for the sudden loss of broadcast network content precipitated by local TV station blackouts. Media Bureau Chief William Lake put his finger on the problem in his speech to the Media Institute last December when he stated: "When a retrans deal expires today, there can be high drama."

With the Commission preparing to examine the marketplace in which retransmission consent is negotiated, I wanted to bring to your attention an unsettling episode involving Univision affiliate WUNI-TV and my company, Full Channel, a family-owned cable operator in Warren, R.I., with about 7,000 customers. WUNI, owned by Entravision Communications Corp., pulled its signal on Feb. 18 after Full Channel refused to accept a 33 percent increase for retransmission consent and costly demands for multicast channel and high-definition delivery.

In my view, this dispute illustrates the need for new retransmission consent rules that rectify the imbalance of power between an affiliate of the country's dominant Spanish-language broadcaster and a small cable operator that serves a tiny fraction of TV households within the Providence, R.I.-New Bedford, Mass. designated market area.

Clearly, WUNI's strategy of granting retransmission consent only in exchange for an exorbitant price hike and other costly demands is aided by several regulations that prevent Full Channel from negotiating as something akin to an equal on the other side of the bargaining table. This artificial imbalance hurts Full Channel's customers, who are innocent third parties, and it should be addressed as the Commission reconsiders what exactly is acceptable conduct under the statutory requirement that broadcasters and

multichannel video programming distributors (MVPDs) bargain for retransmission consent in good faith.

Full Channel believes it is vital for the Commission to provide new guidance that will yield greater certainty to the marketplace and result in fewer failed deals and dropped signals. Full Channel stands ready to assist the Commission's search for policy outcomes that protect the interest of consumers when they are victimized by the heavy-handed tactics of a broadcaster like WUNI, which seems to have a rather strained understanding of what it means to serve in the public interest.

Sincerely,

A handwritten signature in black ink, appearing to read "Levi C. Maaia". The signature is fluid and cursive, with the first name "Levi" being more prominent and the last name "Maaia" following in a similar style.

Levi C. Maaia
Vice President
Full Channel TV, Inc.